

# EXHIBIT A

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THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

HEADWATER RESEARCH, LLC,

Plaintiff,

vs.

SAMSUNG ELECTRONIC CO., LTD  
AND SAMSUNG ELECTRONICS  
AMERICA, INC.,

Defendants.

Case No.  
2:22-CV-00422-RG-RSP

REMOTE VIDEOTAPED DEPOSITION

Via ZOOM of

ALIREZA RAISSINIA

December 15, 2023

9:02 A.M. PST

STENOGRAPHICALLY REPORTED BY:  
JO ANN LOSOYA, CSR, RPR, CRR  
LICENSE #: 084-002437

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1 this button, I'm trying and I get no reaction.

2 That's sort of -- it's more of an interaction with  
3 the user.

4 Q. Do all applications that are being  
5 interacted with provide benefit to the user?

6 A. No, not all applications. That's why  
7 some are foreground and some are background. Some  
8 are interactive and some are not.

9 Q. Well, my question was a bit more  
10 specific. Do all applications that are being  
11 interacted with by a user benefit the user?

12 A. That's hard to say. I am not expected to  
13 tell you that's the case, but that's inferred at  
14 least in this claim in my opinion.

15 Q. Is whether a user of a device perceiving  
16 a benefit subjective?

17 MR. MIRZAI: Same objection, and also  
18 vague.

19 BY THE WITNESS:

20 A. It could be.

21 Q. You can set aside Exhibit 6 again.

22 A. In my opinion, it depends on the  
23 application. This application could be a picture.  
24 It could be trying to buy something. It depends on  
25 the application. Not every application necessarily

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REPORTER CERTIFICATE

I, JO ANN LOSOYA, a Certified Shorthand  
Reporter within and for the State of Illinois, do  
hereby certify:

That previous to the commencement  
of the examination of the witness, the witness was  
duly sworn to testify the whole truth concerning the  
matters herein; That the foregoing deposition  
transcript was reported stenographically by me, and  
the foregoing constitutes a true record of the  
testimony given and the proceedings had; That the  
said deposition was taken before me at the time and  
place specified; That I am not a relative or  
employee or attorney or counsel, nor a relative or  
employee of such attorney or counsel for any of the  
parties hereto, nor interested directly or  
indirectly in the outcome of this action.

IN WITNESS WHEREOF, I do hereunto set my  
hand this day, December 21, 2023.



JO ANN LOSOYA, CSR, RPR, CRR  
C. S. R. 84-002437